

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

IN RE: AQUEOUS FILM-FORMING
FOAMS PRODUCTS LIABILITY
LITIGATION

MDL No. 2:18-mn-2873-RMG

**This Document Relates to
ALL CASES**

**JOINT MOTION FOR EXTENSION OF TIME TO SUBMIT PROPOSED REAL
PROPERTY PRODUCT ID SITES TO THE COURT**

Pursuant to Local Civ. Rule 6.01 (D.S.C.), Co-Lead Counsel for Plaintiffs and Defendants respectfully move this Court for a brief extension of time to submit an agreed list or competing lists of Real Property Product ID Sites to the Court pursuant to Case Management Order No. 32. This Motion is based on the following grounds:

1. Pursuant to CMO 32, the Parties are to submit an agreed list of Real Property Product ID Sites or competing lists to the Court by no later than March 7, 2025. Dkt. 6571.
2. The PEC has proposed its initial list of potential Real Property Product ID Sites to the DCC, and the DCC has proposed an additional list of Sites to the PEC for consideration. However, the Parties require additional time to meet and confer regarding the selection of the 10 to 15 Real Property Product ID Sites from among the Parties' initial proposals.
3. The Parties request a brief extension of time in order to allow their discussions to continue. The Parties ask that the Court extend the current deadline to submit an agreed list of Real Property Product ID Sites or competing lists to the Court until March 26, 2025. Should briefing be necessary to determine the final pool of Real Property Product ID Sites, then such briefing would be submitted by no later than April 2, 2025.
4. This is the Parties' first request for an extension of time.

5. The requested extension will not affect any other existing deadlines.

WHEREFORE, Co-Lead Counsel for Plaintiffs and Defendants respectfully request that the Court extend the time for the Parties to submit an agreed list or competing lists of Real Property Product ID Sites to the Court pursuant to CMO No. 32 until March 26, 2025.

Dated: March 5, 2025

Respectfully submitted,

/s/ Michael A. London

Michael A London
Douglas and London PC
59 Maiden Lane, 6th Floor
New York, NY 10038
P: (212) 566-7500
mlondon@douglasandlondon.com

Scott Summy
Baron & Budd, P.C.
3102 Oak Lawn Avenue
Suite 1100
Dallas, TX 75219
P: (214) 521-3605
ssummy@baronbudd.com

Joseph F. Rice
Motley Rice LLC
28 Bridgeside Blvd.
Mount Pleasant, SC 29464
P: (843) 216-9000
jrice@motleyrice.com

Co-Lead Counsel for Plaintiffs

Fred Thompson, III
Motley Rice LLC
28 Bridgeside Blvd.
Mt Pleasant, SC 29464
P: (843)-216-9000
F: (843)-216-9440
ftompson@motleyrice.com

Liaison Counsel for Plaintiffs

/s/ Michael A. Olsen

Michael A. Olsen
Mayer Brown LLP
71 South Wacker Drive
Chicago, IL 60606
P: (312) 701-7120
molsen@mayerbrown.com

Joseph G. Petrosinelli
Williams & Connolly LLP
725 Twelfth Street, N.W.
Washington, DC 20005
P: (202) 434-5547
jpetrosinelli@wc.com

Co-Lead Counsel for Defendants

David E. Dukes
Nelson Mullins Riley & Scarborough LLP
1320 Main Street, 17th Floor
Columbia, SC 29201
P: (803) 255-9451
F: (803) 256-7500
david.dukes@nelsonmullins.com

Brian Duffy
Duffy & Young LLC
96 Broad Street
Charleston, SC 29401
P: (843) 720-2044
F: (843) 720-2047
bduffy@duffyandyoung.com

Co-liaison Counsel for Defendants